Lesley E. Weaver (SBN 191305) BLEICHMAR FONTI & AULD LLP 555 12th Street, Suite 1600 Oakland, CA 94607

Tel.: (415) 445-4003 Fax: (415) 445-4020 lweaver@bfalaw.com

Derek Loeser (admitted *pro hac vice)* KELLER ROHRBACK LLP 1201 Third Avenue, Suite 3200 Seattle, WA 98101

Tel.: (206) 623-1900 Fax: (206) 623-3384

dloeser@kellerrohrback.com

Plaintiffs' Co-Lead Counsel

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA

IN RE: FACEBOOK, INC., CONSUMER
PRIVACY USER PROFILE LITIGATION

THIS DOCUMENT RELATES TO:
ALL ACTIONS

MDL No. 2843

Case No. 18-md-02843-VC

DECLARATION OF ANNE K. DAVIS IN SUPPORT OF STIPULATED REQUEST FOR ORDER EXTENDING TIME

I, Anne K. Davis, declare and state as follows:

- 1. I am an attorney licensed in the State of California and admitted to the United States District Court for the Northern District of California. I am an associate at Bleichmar Fonti & Auld LLP ("BFA"), and represent plaintiffs in *In re Facebook, Inc. Consumer Privacy User Profile Litigation*, Case No. 18-md-02843-VC (the "MDL"). I am a member in good standing of the bar of the State of California and of this Court.
- 2. Pursuant to Local Rule 6-2(a), this declaration is made in support of the Stipulation Requesting an Order Changing the Time to Respond to the MDL Plaintiffs' Administrative Motion to Consider Whether Cases Should be Related ("Motion to Relate"). No previous modifications have been made as to timing of this motion.
- 3. On Monday, September 9, 2019, the *Hassan* plaintiffs emailed this Court regarding their time to respond to the Motion to Relate. Following this email, co-counsel Benjamin Gould of Keller Rohrback and I spoke with plaintiff, Anjeza Hassan, who represented she was speaking for all *Hassan* plaintiffs. Ms. Hassan requested an extension of time to respond until September 16, 2019. We agreed with the request.
- 4. On September 9, 2019, to facilitate the *Hassan* plaintiffs request for an extension, counsel for Plaintiffs conferred with both Facebook's MDL counsel, Joshua Lipshutz of Gibson, Dunn & Crutcher LLP, counsel in this action, as well Facebook's *Hassan* counsel, Pavan Malhotra of Keker, Van Nest & Peters LLP. Both stated that Defendant Facebook would not oppose this request to extend time to respond.
- 5. The requested time modification will have the effect of lengthening the *Hassan* Plaintiffs' time to respond, which would otherwise be due Wednesday, September 11, 2019, to Monday, September 16, 2019.

| 6. | I declare under penalty of perjury under the laws of the United States and the State of |
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| California tha | t the foregoing is true and correct and to the best of my knowledge. This declaration was |
| executed in Oakland, California. | |
| DATED: Sep | otember 10, 2019 /s/ Anne K. Davis Anne K. Davis |